

ORIGINAL

DIVISION OF CONSUMER ADVOCACY
Department of Commerce and
Consumer Affairs
335 Merchant Street, Room 326
Honolulu, Hawaii 96813
Telephone: (808) 586-2800

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

PUBLIC UTILITIES
COMMISSION

2009 APR - 6 P 3:28

FILED

In the Matter of the Application of)
)
PUBLIC UTILITIES COMMISSION)
)
Instituting a Proceeding to Investigate)
Implementing a Decoupling Mechanism for)
Hawaiian Electric Company, Inc., Hawaii)
Electric Light Company, Inc., and Maui)
Electric Company, Limited.)

DOCKET NO. 2008-0274

DIVISION OF CONSUMER ADVOCACY'S
SIMULTANEOUS INFORMATION REQUESTS

Pursuant to Order Approving, with Modifications, Stipulated Procedural Order
Filed on December 26, 2008, issued by the Commission on January 21, 2009, the
Division of Consumer Advocacy submits its **SIMULTANEOUS INFORMATION**
REQUESTS in the above docketed matter.

DATED: Honolulu, Hawaii, April 6, 2009.

Respectfully submitted,

By Catherine P. Awakuni
CATHERINE P. AWAKUNI
Executive Director

DIVISION OF CONSUMER ADVOCACY

DOCKET NO. 2008-0274

PUBLIC UTILITIES COMMISSION

**DIVISION OF CONSUMER ADVOCACY'S SIMULTANEOUS
INFORMATION REQUESTS**

INSTRUCTIONS

In order to expedite and facilitate the Consumer Advocate's review and analysis in the above matter, the following is requested:

1. For each response, the Company should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, the Company should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by the Company to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, Company instructions, or any other relevant authoritative source which the Company used.
4. Should the Company claim that any information is not discoverable for any reason:

- a. State all claimed privileges and objections to disclosure;
- b. State all facts and reasons supporting each claimed privilege and objection;
- c. State under what conditions the Company is willing to permit disclosure to the Consumer Advocate (e.g., protective agreement, review at business offices, etc.); and
- d. If the Company claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that the Company claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

**BLUE PLANET FOUNDATION
("BPF")**

DOCKET NO. 2008-0274

PUBLIC UTILITIES COMMISSION

**DIVISION OF CONSUMER ADVOCACY'S INFORMATION REQUESTS TO
BLUE PLANET FOUNDATION ("BPF")**

- CA/BPF-IR-1 In its March 30 Initial Statement of Position at page 6, BPF states, "Blue Planet favors a more formal *quid pro quo* arrangement for several reasons." Please describe and explain each element of the "more formal *quid pro quo*" that is being recommended by BPF, indicating each metric to be employed and how performance relative to each metric would be scored and translated or applied for ratemaking purposes to accomplish the desired, "...linking [of] these commitments to RAM benefits."
- CA/BPF-IR-2 In its March 30 Initial Statement of Position at page 6, BPF states, "Blue Planet favors a more formal *quid pro quo* arrangement for several reasons." Please provide a schedule listing and quantifying each of the "commitments" that BPF believes should be linked into RAM rate adjustments in each available future year.
- CA/BPF-IR-3 Please provide specifics illustrative calculations that BPF has developed to show how future HECO performance relative to the "commitments" listed in your response to CA/BFP-IR-2 should be linked into the RAM mechanism.

CA/BPF-IR-4 Please provide complete copies of all calculations, spreadsheet files, workpapers, surveys and other documents associated with each of the efforts described in your responses to CA/BPF-IR-1 through CA/BFP-IR-3 of this information request.

CA/BPF-IR-5 To the extent not provided in response to CA/BPF-IR-1 through CA/BFP-IR-4, above, please provide complete copies of all other calculations, spreadsheet files, workpapers, surveys, documentation and other analyses supporting the conclusions and recommendations stated in your Initial Statement of Position.

**DEPARTMENT OF BUSINESS, ECONOMIC
DEVELOPMENT, AND TOURISM
("DBEDT")**

DOCKET NO. 2008-0274

PUBLIC UTILITIES COMMISSION

**DIVISION OF CONSUMER ADVOCACY'S INFORMATION REQUESTS TO
THE DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND TOURISM
{ "DBEDT" }**

CA/DBEDT-IR-1 In its March 30 Initial Statement of Position at page 6, DBEDT recommends, "Consideration of other provisions that safeguard the ratepayers' interest, such as a cap or limit on the increase in the total target revenue requirements, or a cap on the percent rate adjustment implemented each year." Please explain and quantify each dollar or percentage cap or limit that is believed by DBEDT to be reasonable and provide illustrative calculations with explanations showing how each proposed cap should serve to limit the RAM and/or RBA increases.

CA/DBEDT-IR-2 In its March 30 Initial Statement of Position at page 6, DBEDT recommends, "Consideration of modifying ECAC such that the performance incentives currently built into the ECAC be modified or eliminated if decoupling is enacted." Please explain and provide copies of each of the studies/analyses that have been performed by or for the DBEDT to evaluate modifications to the ECAC, indicating the dates each study/analysis was undertaken and the persons who performed such work.

CA/DBEDT-IR-3 In its March 30 Initial Statement of Position at page 7, DBEDT lists several, "performance metrics" that could be used for, "Adjusting the target revenue requirements based on performance metrics related to the achievement of the HECO Companies' commitments under the Energy Agreement." Please explain and describe with specificity how the individual numerical targets should be established, for each of the listed "performance metrics" in each year, describing the process and calculations to be used to update or modify such target values and translate performance into rate adjustments.

CA/DBEDT-IR-4 To the extent not provided in response to CA/DBEDT-IR-1 through CA/DBEDT-IR-3, above, please provide complete copies of all other calculations, spreadsheet files, workpapers, surveys, documentation and other analyses supporting the conclusions and recommendations stated in your Initial Statement of Position.

**HAIKU DESIGN AND ANALYSIS
("HDA")**

DOCKET NO. 2008-0274

PUBLIC UTILITIES COMMISSION

**DIVISION OF CONSUMER ADVOCACY'S INFORMATION REQUESTS TO
HAIKU DESIGN AND ANALYSIS ("HDA")**

CA/HDA-IR-1 In its March 30 Initial Statement of Position at page 7, HDA recommends, "...that it is time to retire the ECAC mechanism and replace it with a straight full cost pass through." Please describe each of the studies/analyses that have been performed by or for the HDA to evaluate modifications to the ECAC, indicating the dates each study/analysis was undertaken and the persons who performed such work and provide complete copies of all calculations, spreadsheet files, workpapers, surveys and other documents associated with each of the efforts relevant to each identified studies/analyses.

CA/HDA-IR-2 Please explain the extent to which the HDA believes that eliminating the performance incentives currently built into the ECAC is justified in light of the size of perceived benefits to implementation of renewable deployment and provide all available quantification of the tradeoffs between elimination of the performance incentives in terms of potential HECO customer impacts in addition to providing complete copies of all studies,

reports, analyses, projections and other information relied upon in support of your response to this information request.

CA/HDA-IR-3 To the extent not provided in response to CA/HDA-IR-1 and CA/HDA-IR-2, above, please provide complete copies of all other calculations, spreadsheet files, workpapers, surveys, documentation and other analyses supporting the conclusions and recommendations stated in your Initial Statement of Position.

**HAWAII RENEWABLE ENERGY ALLIANCE
("HREA")**

DOCKET NO. 2008-0274

PUBLIC UTILITIES COMMISSION

**DIVISION OF CONSUMER ADVOCACY'S INFORMATION REQUESTS TO HAWAII
RENEWABLE ENERGY ALLIANCE ("HREA")**

CA/HREA-IR-1 In its March 30 Initial Statement of Position at page 4, item 6, HREA states, "Thus, we would favor some sort of a performance-based mechanism that would tie implementation to decoupling to the pace of renewable deployment ala Feed-In Tariffs, net metering and competitive bidding." Please describe with specificity how the individual performance targets should be established, for each of the relevant performance measures in each year, describing the process and calculations to be used to update or modify such target values and translate performance into rate adjustments.

CA/HREA-IR-2 In its March 30 Initial Statement of Position at page 5, item 7, HREA states, "Therefore, we recommend that the ECAC be converted to a straight fuel-cost pass through." Please provide complete copies of all studies/analyses calculations, spreadsheet files, workpapers, surveys and other documents associated with work done by HREA that has been relied upon to evaluate modifications to the ECAC, indicating the dates each study/analysis was undertaken and the persons who performed such work.

CA/HREA-IR-3 With respect to its recommendation to convert the ECAC to a straight fuel-cost pass through, please explain the extent to which the HREA believes that eliminating the “mechanism that provides an incentive to operate conventional generators as efficiently as possible” is justified in light of the size of perceived benefits to implementation of renewable deployment.

CA/HREA-IR-4 Please provide all available quantification of the tradeoffs between elimination of the ECAC “mechanism” in terms of potential HECO customer impacts, including complete copies of all studies, reports, analyses, projections and other information relied upon in support of your response to this information request.

CA/HREA-IR-5 To the extent not provided in response to CA/HREA-IR-1 to CA/HREA-IR-4, above, please provide complete copies of all other calculations, spreadsheet files, workpapers, surveys, documentation and other analyses supporting the conclusions and recommendations stated in your Initial Statement of Position.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **DIVISION OF CONSUMER ADVOCACY'S SIMULTANEOUS INFORMATION REQUESTS** was duly served upon the following parties, by personal service, hand delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR § 6-61-21(d).

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